

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
JOY CHEN
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Joy_Chen@fd.org
6 Attorney for Pedro Nunez Manrique
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 PEDRO NUNEZ MANRRIQUE,
15 Defendant.

Case No. 2:24-mj-00578-EJY

**STIPULATION TO CONTINUE
BENCH TRIAL**
(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and Between Jason M. Frierson,
17 United States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen,
19 Assistant Federal Public Defender, counsel for Pedro Nunez Manrique, that the bench trial
20 currently scheduled on January 15, 2025, be vacated and continued to a date and time
21 convenient to the Court, but no sooner than sixty (60) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. The parties require additional time for negotiations of a possible plea
24 agreement in this matter.
25 2. Defense counsel requires additional time to review discovery, conduct
26 independent investigation, and counsel the defendant on his options.

1 3. The defendant is out of custody and does not oppose the continuance.

2 4. The parties agree to the continuance

3 5. Additionally, denial of this request for continuance could result in a
4 miscarriage of justice. The additional time requested by this Stipulation is excludable in
5 computing the time within which the trial herein must commence pursuant to the Speedy Trial
6 Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title
7 18, United States Code § 3161(h)(7)(B)(iv).

8 This is the first request for a continuance of the bench trial.

9 DATED this 7th day of January, 2025.

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11 RENE L. VALLADARES
12 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

13 By /s/ Joy Chen

14 JOY CHEN
15 Assistant Federal Public Defender

 By /s/ Skyler Pearson

 SKYLER PEARSON
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 PEDRO NUNEZ MANRRIQUE,

7 Defendant.
8

Case No. 2:24-mj-00578-EJY

ORDER

9
10 IT IS THEREFORE ORDERED that the bench trial currently scheduled on Wednesday,
11 January 15, 2025, at 9:30 a.m., be vacated and continued to March 26, 2025 at the hour of 9:30
12 a.m. in Courtroom 3D.

13 DATED this 7th day of January, 2025.

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15 UNITED STATES MAGISTRATE JUDGE
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